

GREENBERG TRAURIG, LLP

David Jay, Esq.

jayd@gtlaw.com

James L. Ryerson, Esq.

ryersonj@gtlaw.com

500 Campus Drive, Suite 400

Florham Park, NJ 07932

Tel: (973) 360-7900

Attorneys for Defendant

Samsung Electronics America, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

HALEY WILLIAMS, individually
and on behalf of all others similarly
situated,

Plaintiff,

v.

SAMSUNG ELECTRONICS
AMERICA, INC.,

Defendant.

No. 2:23-cv-00989-JMV-JRA

**CERTIFICATION OF DAVID JAY IN
SUPPORT OF DEFENDANT
SAMSUNG ELECTRONICS
AMERICA, INC.'S MOTION TO
DISMISS PLAINTIFF'S FIRST
AMENDED COMPLAINT**

I, David Jay, of full age, certify as follows:

1. I am a Shareholder with the law firm of Greenberg Traurig, LLP, attorneys for Defendant Samsung Electronics America, Inc. ("SEA") in the above-captioned action. I am a member in good standing of the bars of the State of New Jersey and this Court. I make this Certification in support of SEA's motion to dismiss Plaintiff's First Amended Complaint. The facts set forth in this

Certification are based on my personal knowledge and understanding.

2. On May 1, 2023, SEA filed a motion to dismiss Plaintiff's initial Complaint in this action (Dkt. 16). In support of that motion, SEA submitted the Certification of Nicole Cantwell, with exhibits (Dkt. 16-2) (the "Cantwell Cert.").

3. Instead of opposing SEA's May 1, 2023 motion to dismiss (Dkt. 23), Plaintiff filed her operative First Amended Complaint on June 15, 2023 (Dkt. 28) (the "FAC").

4. The FAC cites to and relies on the Cantwell Cert. (*see, e.g.*, FAC ¶¶ 26, 28, 33).

5. SEA also relies on the Cantwell Cert. in support of its instant motion to dismiss the FAC.

6. Thus, attached hereto as **Exhibit A** is a true and correct copy of the Cantwell Cert., with exhibits 1 through 6, as filed on May 1, 2023 (Dkt. 16-2).

Pursuant to 28 U.S. Code § 1746, I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on July 17, 2023.

/s/ David Jay, Esq.

David Jay, Esq.

GREENBERG TRAURIG, LLP

500 Campus Drive, Suite 400

Florham Park, NJ 07932

Attorneys for Defendant

Samsung Electronics America, Inc.